



November 8, 2022

*Via ECF*

Hon. Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

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Re: *Esposito v. Block, Inc. et al.*, No. 1:22-cv-08636-RA

Dear Judge Abrams:

Enclosed please find the Parties' joint Stipulation and [Proposed] Order continuing the date upon which responsive pleading is due and initial case management deadlines. Given the waivers of service executed by Defendants on November 7, 2022, Defendants' deadline for responding to the complaint is currently January 6, 2023. In addition, the Court has previously directed the parties to submit a joint status letter and proposed case management plan and scheduling order by December 2, 2022 and has scheduled a status conference for December 9, 2022. The parties jointly request that the Court order that:

1. Defendants' deadline to respond to the initial complaint in this Action, or to any complaint in any action consolidated into this Action, be adjourned until after the Court appoints a lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995; and

2. The December 2, 2022 deadline for submission of a joint status letter and proposed case management plan and scheduling order, along with the December 9, 2022 status conference, be adjourned pursuant to the terms of the attached Stipulation and Proposed Order.

No previous request has been made for the extensions of time requested herein.

Respectfully submitted,

/s/ Jennifer M. Keighley

Jennifer M. Keighley

*Counsel for Defendants*